

Holland & Knight

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Rafe Petersen
(202) 419-2481
rafe.petersen@hklaw.com

December 21, 2011

Via Federal Express

Chris Muehlberger, Esq.
Assistant Regional Counsel
United States Environmental Protection Agency
Region 7
901 North 5th Street
Kansas City, Kansas 66101

U.S. Environmental Protection Agency
Office of Administrative Law Judges
1099 14th Street, N.W.
Franklin Court
Suite 350
Washington, DC 2005

RECEIVED BY OALJ
2011 DEC 22 AM 11:29

Re: Rotary Drilling Supply, Inc., Mineral Resource Technologies, Inc., and Kleinschmidt Trucking, Inc. Proceedings Under Section 309(A)(3) of the Clean Water Act, 33 U.S.C. § 1319(A)(3)

Dear Counsel:

Enclosed for filing please find service copies of the following:

1. Entry of Appearance of Rafe Petersen on behalf of Mineral Resources Technologies, Inc.; and
2. Motion for Extension of Time for the filing of Answer.

If you have questions or concerns regarding these pleadings, please contact me at the number referenced above.

RCRA



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Chris Muehlberger, Esq.

December 21, 2011

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Sincerely yours,

HOLLAND & KNIGHT LLP



Rafe Petersen

RP/mec

Enclosures

cc: Karen A. Flournoy, Director
Dr. Delia Garcia, Compliance Officer
Darriel Coleman, Owner - Rotary Drilling Supply, Inc.
Ronald T. Polk, Registered Agent for Kleinschmidt Trucking, Inc.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

IN THE MATTER OF:

§

ROTARY DRILLING SUPPLY, INC.,

§

MINERAL RESOURCE TECHNOLOGIES,
INC.,

§

Docket No. CWA-07-2011-0100

And KLEINSCHMIDT TRUCKING, INC.

§

Respondents

§

PROCEEDINGS UNDER SECTION 309(A)(3)
OF THE CLEAN WATER ACT, 33 U.S.C. §
1319(A)(3)

§

RECEIVED BY OALJ
2011 DEC 22 AM 11:30

ENTRY OF APPEARANCE OF RAFE PETERSEN

The undersigned, Rafe Petersen, of Holland & Knight, LLP, hereby enters his appearance for
Respondent Mineral Resource Technologies, Inc. in the above referenced matter.

Dated: December 21, 2011

HOLLAND & KNIGHT LLP

By: 

Rafe Petersen

D.C. Bar No. 465542

2099 Pennsylvania Avenue, N.W., Suite 100
Washington, D.C. 20006
Telephone: (202) 955-3000
Facsimile: (202) 955-5564
Email: rafe.petersen@hklaw.com

*Counsel for Respondent,
Mineral Resource Technologies, Inc.*

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7

901 NORTH 5TH STREET

KANSAS CITY, KANSAS 66101

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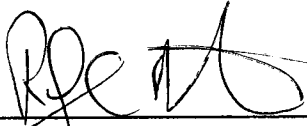
CERTIFICATE OF SERVICE

I hereby certify that on this 21th day of December 2011, a copy of the foregoing Entry of Appearance was filed with the Regional Hearing Clerk of the United States Environmental Protection Agency - Office of Regional Counsel. In addition, a copy of the attached Entry of Appearance was served on the following parties by U.S. First Class Mail - postage prepaid, addressed as follows:

Karen A. Flournoy, Director
Chris Muehlberger, Assistant Regional Counsel
Dr. Delia Garcia, Compliance Officer
Water, Wetlands and Pesticides Division
United States Environmental Protection Agency
Region 7
901 North 5th Street
Kansas City, Kansas 66101

Darriel Coleman, Owner
Rotary Drilling Supply, Inc.
1150 Truman Boulevard
P.O. Box 302
Crystal City, Missouri 63028

Ronald T. Polk
(Registered Agent for Kleinschmidt Trucking, Inc.)
12203 State Road CC
Festus, Missouri 63038



Counsel for Respondent
Mineral Resource Technologies, Inc.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

IN THE MATTER OF: §

ROTARY DRILLING SUPPLY, INC., §

MINERAL RESOURCE TECHNOLOGIES, INC., § Docket No. CWA-07-2011-0100

And KLEINSCHMIDT TRUCKING, INC. §

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OF THE CLEAN WATER ACT, 33 U.S.C. §
1319(A)(3) §

UNOPPOSED MOTION FOR EXTENSION OF TIME

Comes now Respondent, Mineral Resource Technologies, Inc., by and through its counsel of record, Rafe Petersen, pursuant to Rule 22.7(b) of the Consolidated Rules of Practice (40 C.F.R. § 22.7(b)) and respectfully requests an extension through and including January 23, 2012 to file its Answer and as good cause therefore states as follows:

Attorney Rafe Petersen was just recently retained on this matter and will be travelling during the holidays.

Prior to filing this Motion, the undersigned contacted counsel for the United States Environmental Protection Agency as to the extension requested herein and counsel indicated they do not oppose.

Dated: December 21, 2011

HOLLAND & KNIGHT LLP

By: 
Rafe Petersen

D.C. Bar No. 465542

2099 Pennsylvania Avenue, N.W., Suite 100
Washington, D.C. 20006
Telephone: (202) 955-3000
Facsimile: (202) 955-5564
Email: rafe.petersen@hklaw.com

*Counsel for Respondent,
Mineral Resource Technologies, Inc.*

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

IN THE MATTER OF: §

ROTARY DRILLING SUPPLY, INC., §

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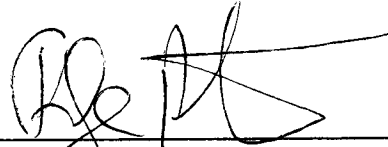
CERTIFICATE OF SERVICE

I hereby certify that on this 21th day of December 2011, a copy of the foregoing Unopposed Motion for Extension of Time was filed with the Regional Hearing Clerk of the United States Environmental Protection Agency - Office of Regional Counsel. In addition, a copy of the attached Motion for Extension of Time was served on the following parties by U.S. First Class Mail - postage prepaid, addressed as follows:

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Ronald T. Polk
(Registered Agent for Kleinschmidt Trucking, Inc.)
12203 State Road CC
Festus, Missouri 63038

A handwritten signature in black ink, appearing to be 'RTP', written over a horizontal line.

Counsel for Respondent
Mineral Resource Technologies, Inc.